

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-E and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiff will continue to prosecute their actions against them.

Respectfully:

/s/ Barbara R. Binis

Barbara R. Binis

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Dated: June 17, 2015

**EXHIBIT A – BERTRAM & GRAF**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-13467	Mayra Luna v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-24577	Marge Borelli v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-22306	Israel Magdalene v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT B – DAVIS BETHUNE & JONES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-00765	Donna Graham v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-15155	Kimberly Rector, David Rector v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Coloplast Corp.

**EXHIBIT C - LAMINACK PIRTLE & MARTINES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-31236	Martha A. Guevara v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT D - LONCAR & ASSOCIATES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-11806	Cheri Tschoepe, Paul Tschoepe v. Ethicon, Inc., Johnson & Johnson, American Medical Systems Holdings, Inc.

**EXHIBIT E - MCGLYNN GLISSON & MOUTON**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-32181	Debra Schaper, Paul Schaper v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Barbara R. Binis